

1  
2  
3  
4  
5  
6 IN THE UNITED STATES DISTRICT COURT  
7 FOR THE WESTERN DISTRICT OF WASHINGTON  
8 AT SEATTLE

9 BARRY LONG,

10 Plaintiff,

11 vs.

12 LIVE NATION WORLDWIDE, INC.,  
d/b/a TICKETMASTER,

13 Defendant.

NO. 2:16-CV-01961-TSZ

**STIPULATED MOTION TO  
WITHDRAW PLAINTIFF'S  
MOTION TO COMPEL  
DISCOVERY RESPONSES;  
PROPOSED ORDER**

Noting Date: December 20, 2018

14  
15 **I. STIPULATED MOTION**

16 Plaintiff Barry Long, AND Defendant Ticketmaster (collectively, the “parties”) through  
17 their counsel of record hereby stipulate, agree, and move to withdraw Plaintiff’s Motion to  
18 Compel Discovery Responses. (Dkt. #53).

19 The parties have reached a tentative settlement arrangement, and in order to avoid  
20 unnecessary costs and time and in the interests of judicial economy, the Parties request this  
21 Court withdraw Plaintiff’s Motion to Compel Discovery Responses (Dkt. #53), without costs or  
22 attorneys’ fees to either party and without notice of presentation of the Order, and to remove all  
23 related dates from the Court’s schedule.

24 STIPULATED MOTION TO WITHDRAW PLAINTIFF’S  
MOTION TO COMPEL DISCOVERY RESPONSES - 1

2:18-cv-01490-TSZ

WASHINGTON CIVIL & DISABILITY  
ADVOCATE

3513 NE 45<sup>th</sup> St, Suite G  
Seattle, WA 98105  
(206) 402-5846

1 Dated This 20th day of December, 2018,

2  
3 Jointly By:

4 /s/Christopher Carney

Christopher Carney

WSBA# 30325

Carney Gillespie Issit PLLP

600 1<sup>st</sup> Ave, Suite LL08

Seattle, WA 98104

(206) 445-0212

Christopher.carney@cgilaw.com

*Attorney for Plaintiff Barry Long*

/s/Conrad A. Reynoldson

Conrad A. Reynoldson

WSBA# 48187

Washington Civil & Disability Advocate

3513 NE 45th Street, Suite G

Seattle, WA 98105

(206) 855-3134

Conrad@wacda.com

*Attorney for Plaintiff Barry Long*

8  
9 SHEPPARD MULLIN RICHTER & HAMPTON, LLP

10 /s/ Gregory F. Hurley

Gregory F. Hurley, CSB # 126791

*Pro Hac Vice*

ghurley@sheppardmullin.com

Bradley J. Leimkuhler, CSB # 261024

*Pro Hac Vice*

bleimkuhler@sheppardmullin.com

Sheppard Mullin Richter & Hampton, LLP

650 Town Center Drive, 4th Floor

Costa Mesa, California 92626-1993

Telephone: 714.513.5100

Facsimile: 714.513.5130

Attorneys for Defendants,

LIVE NATION WORLDWIDE, INC. and

TICKETMASTER, LLC

20  
21 **II. ORDER**

22 Having read the above stipulated motion regarding Plaintiff's Motion to Compel  
23 Discovery Responses, and good cause appearing, the Court ORDERS:

24 STIPULATED MOTION TO WITHDRAW PLAINTIFF'S  
MOTION TO COMPEL DISCOVERY RESPONSES - 2

2:18-cv-01490-TSZ

WASHINGTON CIVIL & DISABILITY  
ADVOCATE

3513 NE 45<sup>th</sup> St, Suite G

Seattle, WA 98105

(206) 402-5846

1 1. Plaintiff's Motion to Compel Discovery Responses (Dkt. #53) be withdrawn without  
2 costs or attorneys' fees to either party, and

3 2. All related dates be removed from this Court's schedule.

4 IT IS SO ORDERED

5  
6 DATED this \_\_\_\_\_ day of December, 2018.

7  
8 \_\_\_\_\_  
9 Thomas S. Zilly  
United States District Judge

10 Presented By:

11 /s/Christopher Carney  
12 Christopher Carney  
WSBA# 30325  
13 Carney Gillespie Issit PLLP  
600 1<sup>st</sup> Ave, Suite LL08  
Seattle, WA 98104  
14 (206) 445-0212  
Christopher.carney@cgilaw.com  
15 *Attorney for Plaintiff Barry Long*

/s/Conrad A. Reynoldson  
Conrad A. Reynoldson  
WSBA# 48187  
Washington Civil & Disability Advocate  
3513 NE 45th Street, Suite G  
Seattle, WA 98105  
(206) 855-3134  
Conrad@wacda.com  
*Attorney for Plaintiff Barry Long*

16 SHEPPARD MULLIN RICHTER & HAMPTON, LLP

17 /s/ Gregory F. Hurley  
18 Gregory F. Hurley, CSB # 126791  
*Pro Hac Vice*  
19 ghurley@sheppardmullin.com  
Bradley J. Leimkuhler, CSB # 261024  
20 *Pro Hac Vice*  
bleimkuhler@sheppardmullin.com  
21 Sheppard Mullin Richter & Hampton, LLP  
650 Town Center Drive, 4th Floor  
22 Costa Mesa, California 92626-1993  
Telephone: 714.513.5100  
23 Facsimile: 714.513.5130

24 STIPULATED MOTION TO WITHDRAW PLAINTIFF'S  
MOTION TO COMPEL DISCOVERY RESPONSES - 3

2:18-cv-01490-TSZ

WASHINGTON CIVIL & DISABILITY  
ADVOCATE

3513 NE 45<sup>th</sup> St, Suite G  
Seattle, WA 98105  
(206) 402-5846

1 Attorneys for Defendants,  
2 LIVE NATION WORLDWIDE, INC. and  
TICKETMASTER, LLC

24 STIPULATED MOTION TO WITHDRAW PLAINTIFF'S  
MOTION TO COMPEL DISCOVERY RESPONSES - 4

2:18-cv-01490-TSZ

WASHINGTON CIVIL & DISABILITY  
ADVOCATE

3513 NE 45<sup>th</sup> St, Suite G  
Seattle, WA 98105  
(206) 402-5846

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

CERTIFICATE OF SERVICE

I, Michael Terasaki, hereby certify under penalty of perjury under the laws of the State of Washington, that on the day set forth below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record for the defendant.

Signed at Seattle, Washington this 20th day of December, 2018.

s/Michael Terasaki  
Michael Terasaki

WASHINGTON CIVIL & DISABILITY ADVOCATE  
3513 NE 45th Street, Suite G  
Seattle, WA 98105  
(206) 855-3134  
terasaki@wacda.com